

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLEN ROBINSON,)	
)	
Plaintiff,)	Case No. 23 CV 2724
)	
v.)	Hon. Judge Martha M. Pacold
)	District Judge
WAYNE FRANO, <i>et al.</i> ,)	
)	JURY TRIAL DEMANDED
Defendants.)	

**PLAINTIFF ALLEN ROBINSON’S SECOND SUPPLEMENTAL RULE 26(a)(1)
DISCLOSURES**

Plaintiff Allen Robinson, by undersigned attorneys, pursuant to Federal Rule of Civil Procedure 26(a)(1), hereby provides the following initial disclosures:

A. The following people are likely to have discoverable information that Plaintiff may use to support his claims in this case:

1. Plaintiff **Allen Robinson**. Mr. Robinson has knowledge of the events leading to his wrongful prosecution and conviction, as well as his wrongful imprisonment and other damages that he has suffered and continues to suffer. Mr. Robinson lives in Chicago, Illinois. May be contacted via Plaintiff’s counsel.
2. Defendants may have knowledge concerning the investigation of the crimes; their contact and communications with one another, with witnesses, with suspects, and with Plaintiff during the course of their investigation; the wrongful arrest, interrogation, prosecution, and conviction of Plaintiff; and the Defendants’ misconduct as alleged in the complaint. In addition, these individuals may have knowledge of the policies and practices of the City of Chicago. Defendants’ locations for purposes of venue are as follows: **Wayne Frano** (Chicago, IL), **Vincent Celio** (Chicago, IL), **Carl Brasic** (Chicago, IL), **Timothy McDermott** (Chicago, IL), **John Folino, Jr.** (Chicago, IL), **David Zelig** (Scottsdale, AZ), **Patrick Conroy** (Norridge, IL) and **Peter Babich** (Chicago, IL). May be contacted via Defendants’ counsel.
3. Other witnesses may have information about Plaintiff’s wrongful prosecution, conviction, and incarceration, the damages that Plaintiff suffered and continues to suffer as a result, including **Latanya Fleming**, **Alanae Robinson**, **Allen Robinson III**, and **Shanice Johnson**. May be contacted via Plaintiff’s counsel.

4. Other witnesses may have information about the police investigation that caused Plaintiff's wrongful prosecution and conviction, witness interviews, lineups, and false documents implicating Plaintiff in the crimes, Plaintiff's criminal proceedings and the Defendants' misconduct as alleged in the complaint.
 - a. **Oscar Russell**, Location unknown and investigation continues.
 - b. **Deandre Guyton**, Location unknown and investigation continues.
 - c. **Quinton Davis**, Location unknown and investigation continues.
 - d. **February Burrage**, Location unknown and investigation continues.
 - e. **Jamion Winters**, Location unknown and investigation continues.
 - f. **Ethel Lewis**, Location unknown and investigation continues.
 - g. **Jenee Moreland**, Location unknown and investigation continues.
 - h. **Latanya Fleming**, May be contacted through Plaintiff's counsel.
 - i. **Johntay Washington**, Location unknown and investigation continues.
 - j. **Ozell Jackson**, Location unknown and investigation continues.
 - k. **Aaron Marshall**, Location unknown and investigation continues.
 - l. **Lamarius Robinson**, Location unknown and investigation continues.
 - m. **Darrick Stidwell**, Location unknown and investigation continues.
 - n. **Andy Dalkin**, Felony Review Assistant State's Attorney.
 - o. **Marc Pomerance**, Illinois State Police Division of Forensic Sciences.
 - p. **Melissa Meana**, Felony Review Assistant State's Attorney.
5. Other witnesses may have information about Plaintiff's criminal proceedings and evidence disclosed during those proceedings, Plaintiff's criminal defense, investigation of the crimes at issue, the reversal of Plaintiff's conviction, Plaintiff's consistent declarations of innocence, as well as Plaintiff's wrongful prosecution and conviction and the resulting damages.
 - a. **Tene McCoy-Cummings**, Assistant State's Attorney.

- b. **Timothy Carter**, Assistant State's Attorney.
- c. **Suzi Collins**, Assistant State's Attorney.
- d. **Charles Piet**, Plaintiff's criminal defense attorney, 134 N. LaSalle St., Suite 715, Chicago, IL 60602.
- e. **Richard Kloak**, Plaintiff's criminal defense attorney, 6914 W. North Ave., Chicago, IL 60707.
- f. **Tom Brandstrader**, Plaintiff's appellate attorney, 53 W. Jackson Blvd Suite 1624, Chicago, IL 60604.
- b. **Jodi Garvey**, Blegen & Garvey, 53 W. Jackson Blvd., Suite 1424, Chicago, IL 60604.
- 6. Other witnesses may have information about Defendants' misconduct as alleged in the complaint with respect to them and their cases.

Case/Victim Name	Year of Investigation	Officers Involved	Witness Names
Kuri	2009	John Folino, Jr., Timothy McDermott	Zae Russell, Tony Fernandez
Williams	2010	Wayne Frano, Jr., John Frano, Cervantes	Anthony Bennett, Jeffery Brown, James Mustafa, Randell Williams
Smith	2017	Marvin Bonstetter, Michael Bertini, Wayne Frano, Nicholas Hertko, Ivan Ramos, Kevin Garcia, Michael Napoli, Salvatore Reina	Melvina Smith, Dante Smith

Moorer	2010	Timothy McDermott, John Folino, Jr., Valkner, Lear, Spanos, Tedeschi, Becker, Gonzalez, Benigno, Szwedo, Cardo, Leal	Thomas Moorer
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Plaintiff's investigation in this matter continues. Plaintiff reserves the right to modify and supplement the list as additional information becomes available. In addition, Plaintiff reserves the right to call at trial any witness disclosed by the Defendants in this matter, as well as anyone who is deposed.

B. Plaintiff is in possession, custody, or control of the following documents, electronically stored information, and tangible things, which may be used to support Plaintiff's claims: police reports, affidavits, criminal trial transcripts, criminal appeal briefs, judicial opinions, and a variety of other case materials, including materials relating to the Defendants' investigation. Plaintiff is producing with these initial disclosure documents Bates numbered Robinson 1-2698 and will produce other information on a rolling basis. Plaintiff's investigation into this matter continues. Plaintiff reserves the right to modify and supplement these documents as additional information becomes available.

C. As a result of his wrongful prosecution and conviction, as well as the years spent in prison for a crime he did not commit, Plaintiff suffered and continues to suffer physical injuries, physical and emotional pain, psychological damage, anguish, humiliation, destruction of his reputation, loss of his young adulthood, disruption of his life and intimate and family relationships, suspension of and interference with his ability to pursue a career, and his opportunity to raise his children, and deprivation of all of the basic pleasures of human experience, including the freedom to live one's life as an autonomous human being. He seeks

compensatory and punitive damages, as well as attorneys' fees and costs under 42 U.S.C. § 1988.

At this time, Plaintiff has not made any computation of these damages.

D. Plaintiff has no document subject to disclosure under Federal Rule of Civil Procedure 26(a)(1)(iv).

ALLEN ROBINSON

By: /s/ Annie Prossnitz
One of his attorneys

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CERTIFICATE OF SERVICE

I, Annie Prossnitz, an attorney, hereby certify that on January 21, 2025, I served the foregoing upon all counsel of record via electronic mail.

/s/ Annie Prossnitz

One of Plaintiff's Attorneys